

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

Rhonda E. Greenblatt, Esq.
222 New Road, Suite 302
Linwood, NJ 08221
(609) 927-9227 (Phone)
(609) 927-9233 (Fax)
Attorney for the Debtor

In Re:

Ellen N. Kell

Case No.: 18-25337

Judge: Altenburg, Jr.

Chapter: 13

CHAPTER 13 DEBTOR-S CERTIFICATION IN OPPOSITION

The debtor in this case opposes the following (choose one):

1. ☒ Motion for Relief from the Automatic Stay filed by U.S. National Bank Association, Et. al., creditor,

A hearing has been scheduled for 05/21/2019, at 10:00 a.m..

☐ Motion to Dismiss filed by the Chapter 13 Trustee.

A hearing has been scheduled for _____, at _____.

☐ Certification of Default filed by _____.

I am requesting a hearing be scheduled on this matter.

2. I oppose the above matter for the following reasons (choose one):

☐ Payments have been made in the amount of \$ _____, but have not been accounted for. Documentation in support is attached.

☒ Payments have not been made for the following reasons and debtor proposes repayment as follows (explain your answer):

In November, the Debtor's daughter was in bad accident and broke her back. In January, the same daughter was assaulted by her boyfriend. The now ex-boyfriend is in jail for aggravated assault and awaiting trial for same. It turns out he did the same thing to two other women previously. With all of this going on, she lost track of the payments she made and missed.

The Debtor proposes to repay the arrearage of \$8,723.65 by modifying her plan and paying an extra \$261.23 per month into the Chapter 13 plan until the arrearage is paid,⁹⁵ well as making an initial \$1,000.00 payment to the lender within ten (10) days.

☐ Other (explain your answer):

3. This certification is being made in an effort to resolve the issues raised in the certification of default or motion.
4. I certify under penalty of perjury that the above is true.

Date:

5/11/2019


/s/ Ellen N. Kell
Debtor=s Signature

Date: _

Debtor=s Signature

NOTES:

1. Under D.N.J. LBR 4001-1(b)(1), this form must be filed with the court and served on the Chapter 13 Trustee and creditor, if applicable not later than 7 days before the date of the hearing if filed in opposition to a Motion for Relief from the Automatic Stay or Chapter 13 Trustee=s Motion to Dismiss.
2. Under D.N.J. 4001-1 (b)(2), this form must be filed with the court and served on the Chapter 13 Trustee and creditor, if applicable not later than 14 days after the filing of a Certification of Default.